UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ALLAN ABRAMS, IRAWADDY VENTURES, LLC, ISABEL KNISPEL, LOIRE VENTURES, LLC, LOUISE No. 11-CV-01667 (GBD) ABRAMS IRREVOCABLE TRUST DATED: 4/2/70, ORINORO VENTURES, LLC, TRUST FBO LOUISE ABRAMS DATED 12/22/50, PARANA VENTURES, LLC, **ECF** Case TRUST FBO ROBERTA ABRAMS DATED: 1/11/88, YENGTZI VENTURES, LLC. TRUST FBO JOSHUA ABRAMS DATED 1/11/88, YENIESI VENTURES, LLC, TRUST FBO ROBERTA ABRAMS DATED: 12/14/88, ST LAWRENCE VENTURES, LLC, TRUST FBO JOSHUA ABRAMS DATED 12/14/88, ZAMIBEZZI VENTURES, LLC, ROBERTA ABRAMS TRUST DATED 12/7/76, WILLAMETTE VENTURES, LLC, JOSHUA ABRAMS TRUST DATED 12/7/76, INDUS VENTURES, LLC, DAVID ABRAMS TRUST DATED 12/7/76, SENEGAL VENTURES, LLC, Plaintiffs, V. NATIONAL WESTMINSTER BANK PLC, Defendant. -----X

DISCLOSURE STATEMENT OF DEFENDANT NATIONAL WESTMINSTER BANK PLC PURSUANT TO FRCP 7.1

Defendant National Westminster Bank Plc makes the following disclosures pursuant to Federal Rule of Civil Procedure 7.1.

1. <u>Identify all parent corporation(s).</u>

National Westminster Bank Plc is a wholly-owned subsidiary of The Royal Bank of Scotland plc, which is a wholly-owned subsidiary of The Royal Bank of Scotland Group plc, a public limited company organized under the laws of the United Kingdom.

2. List any publicly-held company that owns 10% or more of the party's stock.

National Westminster Bank Plc is a wholly-owned subsidiary of The Royal Bank of Scotland plc, which is a wholly-owned subsidiary of The Royal Bank of Scotland Group plc, a public limited company organized under the laws of the United Kingdom.

Dated: New York, New York May 31, 2011

SCHULTE ROTH & ZABEL LLP

By: /s/ Michael E. Swartz

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